



BCS' Response: Open consultation AI Management Essentials tool

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Introduction

The Department for Science, Innovation and Technology’s (DSIT) invited feedback on *AI Management Essentials*, a self-assessment tool that aims to help organisations assess and implement responsible AI management systems and processes.

DSIT said the consultation would help ensure that the tool is fit-for-purpose and supports businesses of different sizes and sectors to implement robust AI governance practices. Respondents were asked to read through the AIME self-assessment tool guidance review the AIME self-assessment tool ¹, answer the consultation questions below with their views on the design, content and use of the AIME tool.

BCS, The Chartered Institute for IT has 70,000 members and over 50 specialist interest groups. As the professional body for technology, we convened six specialist group members to respond to this consultation.

The group was comprised of the following experts:

Steve Sands: Chartered BCS Fellow (CITP FBCS MCIIIS). Security Consultant & Data Protection Officer at Synectics Solutions. BCS Information Security Specialist Group (ISSG) Chairman.

Alan Brown: BCS Fellow, Strategy Advisor, Entrepreneur, and Professor in Digital Economy. Member of the BCS Fellows Technical Advisory Group.

Gomathi Ramalingam: Director of Quality and Assurance and Product Delivery, Software Quality Strategist at Simba Chain and member of the BCS Software Testing Specialist Group.

Luke Farley: AI Expert, technology entrepreneur and founder of ClarityAI, a consultancy that helps organisations understand and benefit from Generative AI.

Gill Ringland: BCS Fellow, Secretary of the BCS IT Leaders Forum, a Fellow of the World Academy of Art and Science, Emeritus Fellow of ICL and of SAMI Consulting.

¹ <https://www.gov.uk/government/consultations/ai-management-essentials-tool/ai-management-essentials-tool-accessible>

Adrian Hopgood: BCS Fellow and committee member of the BCS Specialist Group for AI. He is an independent consultant and Emeritus Professor of Intelligent Systems at the University of Portsmouth.

1 What are your general impressions of the AIME tool?

Summary of the collective response:

The AIME tool was regarded as a valuable starting point for organisations embarking on AI management and governance, particularly those not yet prepared for full ISO certification. However, contributors identified areas for refinement to enhance its effectiveness, especially for SMEs with limited resources or AI governance expertise.

While the tool's structure is logical, concerns were raised about its accessibility and applicability. Smaller organisations might struggle with technical language or find its broad scope overwhelming, leading to disengagement. Given SMEs already face compliance in cybersecurity, data handling, and vendor management, the tool risks being perceived as bureaucratic rather than practical, potentially discouraging AI adoption.

A recommendation was to include a section on an organisation's understanding of AI, and how that aligned with its culture, values, and operational requirements. This could also contextualise responses and contribute to scoring mechanisms. To address assumptions in Sections 6 and 7 about decision-makers' AI knowledge, contributors suggested adding questions on training and experience. Additionally, while the tool effectively covers AI risks—such as bias, fairness, and data protection—some contributors questioned whether it lacked a focus on AI's benefits. A section on strategic AI advantages, including purpose, planning, implementation, testing, and communication, was recommended for a more balanced approach.

Clearer guidance, simplified terminology, and tailored resources were suggested to improve accessibility and usability across different AI maturity stages.

The tool's potential integration into government procurement frameworks received mixed feedback. While it could incentivise responsible AI practices, concerns were raised about disproportionate burdens on SMEs. Without clear support and interpretation guidance, smaller organisations might struggle with implementation. Additionally, its success in procurement would depend on procurement teams' ability to assess vendor responses critically.

Overall, while the respondents felt that the AIME tool is an important step in AI governance, refinements are needed to improve its practicality and impact. Addressing accessibility concerns, tailoring guidance to different organisational needs, and ensuring it complements existing governance processes will be critical to its success. Without these improvements, experts caution the tool risks being underutilised and ineffective in fostering responsible AI governance and adoption.

2 Does the overall structure of the tool make sense? Why/why not?

The contributors offered varied perspectives on the tool's structure, focusing on its logical flow, clarity, and potential for refinement. BCS Information Security Specialist Group (ISSG) Chairman, Steve Sands praised the structure as logical and intuitive, starting with broad governance questions before delving into more specific aspects. However, he recommended including an additional response option, such as "In Progress," for certain questions to reflect partial compliance or ongoing efforts. For example: **1.1 Do you maintain a record of the AI systems your organisation develops and uses?**): a Yes, b No, c In progress.

This would allow those organisations that have commenced the work, but not completed, to rate their progress with the other questions in the section. He also suggested linking each question to best practice guidance or external resources, enabling respondents to identify what good looks like and address areas for improvement. This could transform the tool into a more dynamic and educational resource, fostering continuous improvement.

Gomathi Ramalingam from the BCS Software Testing Specialist Group recommended incorporating a preliminary section to assess the organisation's familiarity with AI concepts and terminologies. She argued that this could contextualise the responses and provide a clearer picture of the organisation's readiness and maturity. Additionally, she proposed weighting this initial assessment to influence the overall scoring, ensuring that the tool reflects both technical understanding and governance practices. Gomathi further suggested using the tool as part of onboarding processes for new hires, embedding AI governance awareness across the organisation.

Alan Brown BCS Fellow, Strategy Advisor, Entrepreneur, and Professor in Digital Economy, expressed concerns about the narrow scope of the tool's structure. While acknowledging its logical flow, he argued that it failed to address some of the broader challenges organisations face in integrating AI into their operations. He added the current tool would require careful positioning to ensure that its utility is clear to users and not over-hyped.

3 Would you change the order of any of the sections/questions? If yes, which questions and why?

The order of the tool's sections was generally considered appropriate, and easy to use. However, Alan Brown, BCS Fellow, Strategy Advisor, Entrepreneur, and Professor in Digital Economy stressed the importance of clearly framing the sections. He noted that some questions could be misinterpreted without proper context, potentially leading to inconsistent or inaccurate responses.

4 We are planning to format the final version of the tool as an interactive decision tree (loosely based on the Cyber Essentials readiness tool). Do you agree that this format is intuitive/easy to use? Why/why not?

Steve and Alan both supported the interactive format for its accessibility, particularly for smaller organisations. Steve highlighted its usefulness in AI governance and suggested downloadable assessments for tracking progress. Alan stressed the importance of simplifying navigation to reduce cognitive load and encourage wider adoption. Gill Ringland welcomed modelling the design of the AIME on the Cyber Essentials readiness tool.

5 Are there any questions that you think are difficult to answer? If yes, what are they? Why are they difficult to answer?

Certain questions, particularly those involving ambiguous or subjective criteria, were identified as potentially challenging for users to answer accurately. Steve pointed out that questions related to AI systems under development might confuse respondents. He recommended clarifying that such systems should be addressed once they reach a certain level of maturity. Alan highlighted the lack of clear definitions for key terms, such as "AI system," which could lead to varied interpretations. He also questioned the utility of subjective response options like "yes," "sometimes," and "no," suggesting that these could fail to capture the nuances of organisational practices.

Gill felt that, Sections 4 and 5 were difficult to answer realistically as posed.

6 Are there any questions that you think are superfluous/unnecessary? If yes, what are they? Why are they superfluous/not needed??

Steve identified question 5.1 as potentially redundant or confusing, suggesting it could be simplified or rephrased for clarity. Gill thought that the fairness questions were unusual. She said either software algorithms obey legal or regulatory requirements or did not. She added it was well known, for instance, that the use of historical data in recruitment and personnel systems penalised women's applications and prospects.

7 Are there any questions that you particularly liked or would find helpful for improving your internal processes? If yes, what are they? Why are they helpful/appealing?

Steve praised questions that align with existing standards, such as ISO27001, noting that these provide a familiar reference point for organisations. He suggested some sections/questions might link to established certifications, so the questions would overlap significantly with existing certifications or processes. For instance, Section 8 could commence with a scoping question to determine if the organisation held relevant Information Security certifications (e.g. ISO27001 ISMS). If the answer was yes, some of the questions in Section 8 should be covered by the Information Security Management Systems. This would allow organisations meeting certain standards to skip redundant queries. Alan highlighted the communication and reporting questions as particularly valuable, as they encouraged organisations to reflect on internal processes and responsibilities.

8 Are there any necessary conditions, statements, or processes that you feel are missing that organisations should be implementing? What are they?

Alan reiterated concerns about the unclear definition of terms and that it should address broader operational challenges. The communication and reporting questions made him think about how his organisation handles these issues. The concept of "who has authority" in these cross-cutting areas is important. He suggested including guidance on how to integrate AI considerations into existing business processes.

9 Is the tool overly burdensome or unrealistic for the target audience (i.e., organisations with limited resources to extensively engage with AI governance frameworks, for example, start-ups and SMEs)?

There was a mixed response to this question. Steve and Alan felt the tool was manageable, and if implemented in an interactive decision tree format, would not be unrealistic to complete. It would prompt organisations to consider aspects of AI management, if they hadn't already. Alan, however, said the challenge could be the amount of time spent considering the questions. The real value, he said, was in 'the thinking that takes place underneath the simple yes or no answers. He added it was important that the responses were recorded and shared internally to support organisational learning and follow up.

Luke Farley, AI Expert, member of the BCS Specialist Group for AI, technology entrepreneur and founder of ClarityAI, a consultancy that helps organisations understand and benefit from Generative AI, felt the tool could be off-putting for some smaller SMEs leaders. Luke said the title, AI Management Essentials, might give small business leaders the impression they were about to learn about the adoption or management of AI tools more generally, instead of working their way through a compliance list that he felt was more appropriate for larger businesses with more sophisticated use cases. His recommendations included changing the name to, for example, the *AI Governance and Risk Management tool kit*. Like others, he said the target audience had to be better identified, and more clarity was needed as to what level organisations had to achieve. He cited, for example, users of Chat apps, when compared to model builders and fine tuners, were very different audiences with different needs and risk profiles. His general feeling was that businesses should be encouraged to experiment and that, out of context, this tool could raise fear/reluctance and present barriers, especially for small businesses. He felt that was particularly so for smaller businesses that risked being left behind, and for whom AI represents an opportunity because they often actively use agility to keep up.

He suggested reframing the tool as part of a suite of resources around AI adoption and management, saying this could be a good resource in an SME context for a compliance team.

Adrian Hopgood, BCS Fellow and committee member of the BCS Specialist Group for AI said he came from a perspective of AI research and education. He believed AI tools should not be deployed without a level of understanding of how they work and their associated shortcomings. He believed several sections, especially Sections 6 and 7, assumed such an understanding. This, he said, suggested the need for additional questions about decision-makers' training and experience. He believed the tool focused on managing AI's potential risks (bias, fairness, data protection), but overlooked its potential benefits. He recommended a section on delivering AI's positive impact, covering strategic purpose, planning, implementation, testing, and communication. It could include clarity of strategic purpose, planning, implementation, testing, and communication

Gill's concerns were that the tool assumed there was a CTO and/or HR personnel but in many SMEs both roles are held by CEO and Gill believed (s)he would give low priority to performing assessment as it is not clear what it would achieve to do so.

10 We are exploring the possibility of embedding AIME in government procurement frameworks. In this model, organisations supplying the government with AI products and services would be required to complete the tool to demonstrate baseline responsible AI management processes. Do you agree that this would incentivise organisations to implement responsible AI management systems?

Steve supported embedding AIME in procurement frameworks, as it would incentivise responsible AI management. Alan however warned that vendors might provide superficial responses unless procurement teams had the expertise to interpret submissions. He emphasised the importance of obtaining detailed insights beneath the surface-level answers.

Gill said it might be good to instead align with, for instance, ISO standards for procurement, to ensure international applicability, as few multi-national suppliers are likely to produce special versions to get UK business.

11 Do you believe that embedding AIME in government procurement processes could have an adverse effect on competition (e.g., add disproportionate burden on SMEs, who may have less resources/capacity to fill out a tool like this, compared to larger organisations)? Is the tool overly burdensome or unrealistic for the target audience (i.e., organisations with limited resources to extensively engage with AI governance frameworks, for example, start-ups and SMEs)?

Steve said overall, he believed the tool in its current format covered all the basic essentials. He said it would be much more onerous to instead force the adoption of ISO42001. This 'AI essentials' approach should align well with the established 'cyber essentials' approach, and he said BCS members had recommended that there could be an equivalent for 'resilience essentials'. Alan said he too didn't think it would have an adverse effect on competition as the tool represented essential information that vendors should provide. He saw it as a necessary baseline for responsible AI adoption rather than a competitive disadvantage.

However, Gill said she thought it would have an adverse effect on competition for SMEs, adding to their workload, while larger organisations could claim to conform to international standards.

BCS

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